

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

PHILIP L. TROPEANO,
PETER TROPEANO, and
CAROLYN PATTON,

Plaintiffs,

v.

CHARLENE DORMAN,
BIANCA DORMAN,
LYDIA DORMAN,
TODD DORMAN,
T&N REALTY TRUST, and
CAPTAIN PARKER ARMS PARTNERSHIP,

Defendants.

CIVIL ACTION
NO. 03CV12231 (RGS)

**JOINT MOTION TO MODIFY SCHEDULING ORDER TO ADJUST THE DEADLINES
FOR EXCHANGE OF EXPERT REPORTS AND EXPERT DISCOVERY**

Pursuant to Rules 16(b) of the Federal Rules of Civil Procedure and Local Rule 16.1(g), the parties respectfully request that the Court amend the scheduling order in the case to adjust the deadlines for the exchange of expert reports and subsequent expert discovery by approximately one month. The parties do not expect that the requested adjustments to the expert discovery deadlines will impact the dates set by the Court for the submission of pre-trial disclosures or commencement of trial and submit with this motion a Proposed Revised Scheduling Order to that effect.

As grounds for this motion, the parties state that the remaining issue of the case, the valuation of the withdrawing partners' interests, involves retrospective and complex analysis, and thus additional time is needed to finalize expert reports and prepare the experts for

deposition.

WHEREFORE, the parties respectfully request that the Court grant its motion.

Attorney for Plaintiffs

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